

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA
Civil Division

WASHINGTON SHERATON CORPORATION,

Plaintiff,

v.

2660 WOODLEY ROAD JOINT VENTURE,

and

JOHN HANCOCK LIFE INSURANCE COMPANY
(Formerly known as John Hancock Mutual Life
Insurance Company),

Defendants.

CONSENT MOTION TO EXTEND FILING DEADLINES

COMES NOW Plaintiff Washington Sheraton Corporation, by and through its counsel, by consent of all counsel, pursuant to Fed. R. Civ. P. 6(b) and L.Cv.R. 7, to respectfully request the entry of an order extending the time within which Plaintiff is required to file its opposition, or otherwise respond to, Defendants' motion to dismiss or in the alternative, for summary judgment, through September 2, 2005, and to extend the time for Defendants to file their Reply through September 16, 2005. In all other respects the existing scheduling order shall remain unchanged.

Wherefore, the parties pray:

1. That the instant motion be granted; and
2. That the Court grant such other and further relief as is just and proper.

Respectfully submitted,

BICKEL & BREWER

By: _____/s/
William A. Brewer III
James S. Renard
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New York, New York
(212) 489-1400
(Not admitted in the District of Columbia)

Counsel for Defendants

SCHEUERMANN & MENIST

By: _____/s/
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Counsel for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing consent motion was this 22nd day of August, 2005, mailed, first class mail, U.S. Postage pre-paid to: William E. Wallace, III, Esquire and Jonathan Cyril Poling, Esquire, MILBANK, TWEED, HADLEY & McCLOY, LLP, 1825 Eye Street, N.W., Suite 1100, Washington, D.C. 20006, Counsel for the Defendants.

_____/s/
John E. Scheuermann

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA
Civil Division

WASHINGTON SHERATON CORPORATION,	)	
	)	
	)	
Plaintiff,	)	
	)	
v.	)	Case No.1:05CV0971
	)	(HHK)
2660 WOODLEY ROAD JOINT VENTURE,	)	
	)	
and	)	
	)	
JOHN HANCOCK LIFE INSURANCE COMPANY	)	
(Formerly known as John Hancock Mutual Life	)	
Insurance Company),	)	
	)	
Defendants.	)	
	)	

ORDER

Upon consideration of the parties' consent motion to extend time, it is by the
Court this ____ day of August, 2005,

O R D E R E D

That the motion is, and is hereby, granted; and
Plaintiff shall oppose, or otherwise respond, to Defendants' motion to dismiss, or
in the alternative, for summary judgment on or before September 2, 2005; and
Defendants shall reply on or before September 16, 2005; and
In all other respects the scheduling order is unchanged.

UNITED STATES DISTRICT JUDGE

Copies to:

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